

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

PIVITAL IP LLC,	)	
	)	
Plaintiff,	)	C.A. No. 20-254-LPS
	)	
v.	)	
	)	
TWILIO INC.,	)	
	)	
Defendant.	)	

**DEFENDANT TWILIO INC.'S MOTION TO DISMISS COMPLAINT**

Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, 35 U.S.C. § 101, and 35 U.S.C. § 287(a), Defendant Twilio Inc. ("Twilio") hereby moves to dismiss with prejudice Plaintiff Pivital IP LLC's Complaint (D.I. 1) for failure to state a claim upon which relief may be granted. The grounds for this motion are set forth in Twilio's Opening Brief, which is submitted herewith. Twilio also joins Defendant ActiveCampaign, LLC's motion to dismiss as it pertains to § 101 filed in a related action, D.I. 10, C.A. No. 19-cv-2176-LPS.

Respectfully submitted,

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